

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ALBERT RAGUSEO, ROBERT GRUN,
JOSHUA GRUN, ZACHARY GRUN, JILL
GRUN, CHRISTINA AIELLO, ALYSSA
SBLENDORIO, MIRIAM BELANGER,
KAITLIN STROUD, THOMAS SANITATE
AND KATELYN GRABINSKY, on behalf of
themselves and all others similarly situated

Plaintiffs,
vs.

CENTRASTATE HEALTHCARE SYSTEMS,
INC.

Defendant

M.Z., on behalf of herself and all others similarly situated, Civil Action No. 23-1049(ZNQ)(LHG)

Plaintiff

vs.

CENTRASTATE HEALTHCARE SYSTEM,
INC. and SHAUNNA ELLISON,

Defendants

RICARDO CUBIDES and LAURA KANTHAL-CUBIDES, Individually And On Behalf Of All Others Similarly Situated, Civil Action No. 23-1075(ZNQ)(LHG)

Plaintiffs,

vs.

CENTRASTATE HEALTHCARE SYSTEM,
INC. and ATLANTIC HEALTH SYSTEM, INC.,

Defendants.

MARIA CARO, individually and on behalf of all others similarly situated, Civil Action No. 23-1123 (ZLQ) (LHG)

<p>Plaintiff, vs. CENTRASTATE HEALTHCARE SYSTEMS, INC.,</p> <p>Defendant.</p> <p>FREDERICK DAWES, on behalf of himself and all others similarly situated,</p> <p>Plaintiff, v. CENTRASTATE HEALTHCARE SYSTEM, INC. and ATLANTIC HEALTH SYSTEM, INC.,</p> <p>Defendants.</p> <p>RENA PUDDER, on behalf of herself and all others similarly situated,</p> <p>Plaintiff, vs. CENTRASTATE HEALTHCARE SYSTEM, INC. and ATLANTIC HEALTH SYSTEM, INC.,</p> <p>Defendants.</p> <p>LEWIS CHEWNING, DAVID HEALEY, and BELLE ROSENBLoom, Individually, and on Behalf of All Others Similarly Situated,</p> <p>Plaintiffs, vs. CENTRASTATE HEALTHCARE SYSTEM, INC.,</p> <p>Defendant.</p>	Civil Action No. 23-1130 (ZLQ) (LHG)
---	--------------------------------------

Plaintiffs Albert Raguseo, Robert Grun, Joshua Grun, Zachary Grun, Jill Grun, Christina Aiello, Alyssa Sblendorio, Miriam Belanger, Kaitlin Stroud, Thomas Sanitate, Katelyn Grabinsky, M.Z, Ricardo Cubides, Laura Kanthal-Cubides, Maria Caro, Frederick Dawes, Rena Pudder, Lewis Chewning, David Healey, and Belle Rosenbloom (together "Plaintiffs") and Defendants CentraState Healthcare System, Inc., Atlantic Health System, Inc., and Shaunna Ellison (together "Defendants") hereby stipulate and agree (the "Stipulation") as follows:

1. All of the captioned matters are hereby consolidated for all purposes under Civil Action No. 23-1024 (ZNQ)(LHG) with the caption:

IN RE: CENTRASTATE HEALTH
SYSTEMS DATA BREACH LITIGATION

Civil Action No. 23-1024 (ZNQ)(LHG)

2. On a going forward basis, all papers shall be filed in Civil Action No. 23-1024 (ZNQ)(LHG). If a paper relates to less than all of the above actions, the caption shall indicate to which action(s) the paper relates.

3. Any actions transferred to this Court, directly filed in the District of New Jersey or removed to the District of New Jersey will automatically be consolidated with this action without the necessity of future motions or orders.

4. Plaintiffs shall file a Consolidated Amended Complaint on the later of April 17, 2023, or seven days after lead counsel has been appointed by the Court.

5. Defendants shall not answer, move, or otherwise respond to the separate individual complaints pending the filing of a Consolidated Amended Complaint.

6. Defendants shall answer, move, or otherwise respond to the Consolidated Amended Complaint within 30 days after filing.

7. Should Defendants choose to file a motion in response to the Consolidated Amended Complaint, they shall follow Judge Quraishi's judicial preferences requiring the filing of a letter of no more than three (3) single-spaced pages seeking a pre-motion conference before the expiration of their deadline to answer, move, or otherwise respond. Plaintiffs shall then submit a written response, not to exceed three (3) single-spaced pages within seven (7) days of the filing of Defendants' letter. The parties will then discuss an appropriate briefing schedule.

8. Nothing in this Stipulation and Order shall be construed as a waiver of any right or defense available to Defendants, including defenses related to service of process and jurisdiction.

9. The Clerk's office is instructed to close the member cases.

STIPULATED and AGREED to this day of March, 2023

By: /s/ Mason A. Barney

Mason A. Barney, Esq.

Steven D. Cohen, Esq.

SIRI & GLIMSTAD LLP

745 Fifth Avenue, Suite 500

New York, New York 10151

Tel: (212) 532-1091

Email: mbarney@sirillp.com

Email: scohen@sirillp.com

Thomas Stavola Jr., Esq.

8 Campus Drive, Suite 105 PMB #161

Parsippany, NJ 07054

Tel: (212) 532-1091

Email: tstavola@sirillp.com

Attorneys for Plaintiffs

ALBERT RAGUSEO, ROBERT GRUN, JOSHUA
GRUN, ZACHARY GRUN, JILL GRUN,
CHRISTINA AIELLO, ALYSSA SBLENDORIO,
MIRIAM BELANGER, KAITLIN STROUD,
THOMAS SANITATE and KATELYN
GRABINSKY

By: Eric R. Fish

Eric R. Fish, Esq.

BAKER & HOSTETLER LLP

45 Rockefeller Plaza

New York, New York 10111

Tel: (212) 589-4200

Fax: (212) 589-4201

Email: efish@bakerlaw.com

Attorneys for Defendants

CENTRASTATE HEALTHCARE SYSTEMS,
INC., ATLANTIC HEALTH SYSTEM, INC., and
SHAUNNA ELLISON

By: Sharon J. Zinns

Sharon J. Zinns, Esq.
ZINNS LAW, LLC
1800 Peachtree St. NW
Suite 370
Atlanta, GA 30309
Tel: (404) 882-9002
Email: sharon@zinnslaw.com

Maureen M. Brady, Esq.

Lucy McShane, Esq.
MCSHANE & BRADY, LLC
1656 Washington Street, Suite 120
Kansas City, MO 64108
Tel: (816) 888-8010
Fax: (816) 332-6295
Email: mbrady@mcschanebradylaw.com
Email: lmcschane@mcschanebradylaw

Attorneys for Plaintiff

M.Z.

By: James E. Cecchi

James E. Cecchi, Esq.
CARELLA, BYRNE, CECCHI,
BRODY & AGNELLO, P.C.
5 Becker Farm Road
Roseland, New Jersey 07068
Tel.: (973) 994-1700
Email: jcecchi@carellabyrne.com

Linda P. Nussbaum, Esq.

NUSSBAUM LAW GROUP, P.C.
1211 Avenue of the Americas, 40th Floor
New York, NY 10036-8718
Tel: (917) 438-9189
Email: lnussbaum@nussbaumpc.com

Christopher L. Ayers, Esq.

SEGER WEISS LLP
55 Challenger Road 6th Floor
Ridgefield Park, NJ 07660
Tel.: (973) 639-9100
Email: cayers@seegerweiss.com

Michael E. Criden, Esq.

CRIDEN & LOVE, P.A.
7301 SW 57th Court, Suite 515
South Miami, FL 33143
Tel.: (305) 357-9000
Email: mcriden@cridenlove.com

Attorneys for Plaintiffs
RICARDO CUBIDES and LAURA KANTHAL-CUBIDES

By: Matthew R. Mendelsohn
Matthew R. Mendelsohn, Esq.
MAZIE SLATER KATZ & FREEMAN, LLC
103 Eisenhower Parkway
Roseland, NJ 07068
Tel.: 973-228-9898
Fax: 973-228-0303
Email: mrm@mazieslater.com

Todd S. Garber, Esq.
FINKELSTEIN, BLANKINSHIP,
FREI-PEARSON & GARBER, LLP
One North Broadway, Suite 900
White Plains, NY 10601
Tel.: 914-298-3284
Fax: 914-908-6722
Email: tgarber@fbfglaw.com

Attorneys for Plaintiff
MARIA CARO

By: Stephen P. Denittis
Stephen P. Denittis, Esq.
Joseph A. Osefchen, Esq.
Shane Prince, Esq.
DeNITTIS OSEFCHEN PRINCE, P.C.
525 Route 73 North, Suite 410
Marlton, New Jersey 08053
Tel.: 856-797-9951
Fax: 856-797-9978

Attorneys for Plaintiffs
FREDERICK DAWES and RENA PUDDER

By: Mark C. Rifkin

Mark C. Rifkin, Esq.

WOLF HALDENSTEIN ADLER FREEMAN &
HERZ LLC

270 Madison Ave.

New York, New York 10016

Tel: (212) 545-4600

Fax: (212) 686-0114

Email: rifkin@whafh.com

Carl V. Malmstrom, Esq.

WOLF HALDENSTEIN ADLER FREEMAN &
HERZ LLC

111 W. Jackson Blvd., Suite 1700

Chicago, Illinois 60604

Tel: (312) 984-0000 Fax: (212) 686-0114

Email: malmstrom@whafh.com

Attorneys for Plaintiffs

LEWIS CHEWNING, DAVID HEALEY, and
BELLE ROSENBLUM

IT IS SO ORDERED, this 17th day of March, 2023



ZAHID N. QURAISHI, U.S.D.J.
LOIS H. GOODMAN, U.S.M.J.